

The Commonwealth of Massachusetts Department of Environmental Quality Engineering Metropolitan Boston - Northeast Region 5 Commonwealth Avenue Wokum Marrachusetts 01801

December 16.1986

SEMS Docto

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Ms. Cheryl Auterio American Glue & Resin Co. 40 School Street Middleton, MA 01949

RE: NOTICE OF NON-COMPLIANCE MIDDLETON - American Glue & Resin Co. - Illegal discharge of floor spillage and steam jacket condensate to the surface of the ground and to groundwater without a DEQE discharge permit.

NOTICE OF NON-COMPLIANCE

WARNING: THIS IS AN IMPORTANT NOTICE. FAILURE TO ADEQUATELY DEAL WITH THIS NOTICE COULD RESULT IN SERIOUS LEGAL CONSEQUENCES.

Dear Ms. Auterio:

On October 23, 1986, Department staff performed an inspection of your facility. At the inspection it was noted that your facility has a number of floor drains that receive spillage and water from within the facility. These floor drains discharge to a catch basin at the rear of your facility that does not drain properly and fills with water. This catch basin is equipped with a sump pump which causes the contents of the catch basin to discharge to the surface of the ground when it fills with water. The water in the catch basin may be contaminated at various times with various chemicals used in the manufacturing processes at your plant; such as toluene, 1,1,1- trichloroethane and polyvinyl acetate, among others.

You also discharge the steam from the steam jackets surrounding the vats in which the adhesive "recipes" are "cooked" to the surface of the ground at the rear of your facility via a one-half inch rubber hose.

Attached is a written description of (1) each activity referred to above, (2) the requirements violated, (3) the action the Department now wants you to take, and (4) the deadline for taking such action.

NOTICE OF NON-COMPLIANCE NON-COMPLIANCE SUMMARY

NAME OF ENTITIY IN NON-COMPLIANCE: American Glue & Resin Company

LOCATION WHERE NONCOMPLIANCE OCCURRED OR WAS OBSERVED: 40 School St. Middleton, MA 01949

DATE WHEN NONCOMPLIANCE OCCURRED OR WAS OBSERVED:

DESCRIPTION OF NONCOMPLIANCE:

- 1) Liquid effluent from the floor drains inside your facility is discharged via a pipe to a catch basin manhole at the rear of your plant. This catch basin manhole has no direct outlet, and when inspected, was full of water mixed with an unknown amount of spillage from the floor inside your plant, which may contain one or more of the chemicals used in your processes at your processes at your plant, such as toluene,1,1,1- trichloroethane, and polyvinyl acetate among others. This catch basin was equipped with a submersible pump to pump water out of it and onto the surface of the ground. Both discharges have the potential for contaminating groundwater at the site.
- 2) Discharge of steam condensate from steam jackets on the vats at your facility used in your adhesive manufacturing processes accomplished via a one-half inch rubber hose to the surface of the ground at the rear of the plant.

DESCRIPTION OF THE REQUIREMENT(S) NOT COMPLIED WITH:

General Laws, Chapter 21, Section 43 and 314 CMR 5.03 - discharging pollutants into Waters of the Commonwealth, specifically, groundwater, and "onto or below the land surface" without a currently valid permit for said discharge.

DESCRIPTION OF THE ACTION TO BE TAKEN NOW, AND THE DEADLINE FOR TAKING SUCH ACTION:

- Immediately cease the discharge decribed above. Immediately contact a consulting engineering firm to develop a scope of work for disposal of all floor drainage, wastewater, and steam condensate generated at your facility that will comply with all DEQE-Division of Water Pollution Control regulations. By January 15, submit to this office a scope of work and the consulting engineering firm contracted by you for proper handling and disposal of the floor spillage, wastewater, and steam condensate at your facility.
- 2) By January 15, 1986, submit to this office plans detailing the locations and construction of the subsurface sewage disposal system presently in use at your facility. Also by this date, submit plans detailing the construction and destination(s) of the surface and storm drainage system serving the inside and the grounds of your facility.

DATE: DEC. 1 6 1986

Sabin M. Lord, Jr.

Deputy Regional Environmental Engineer